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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

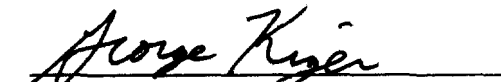
In the Matter of)	
)	
Redevelopment of Spectrum to)	ET Docket No. 92-9
Encourage Innovation In the)	
Use of New Telecommunications)	Public Notice DA 93-603
Technologies)	May 28, 1993

Comments of the
Telecommunications Industry Association
Fixed Point to Point Communication Section
Regarding Supplemental Alcatel Filing

The Telecommunications Industry Association ("TIA") is a membership organization representing over 500 manufacturers of equipment used by all sectors of the communications industry. The TIA Fixed Point to Point Communications Section is the major industry group representing fixed point to point microwave manufacturers. The TIA Fixed Point to Point Communications Section is pleased to submit these comments on behalf of its membership in the above-captioned Further Petition for Rule Making.

Respectfully submitted,


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Vice-President


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Chairman, Fixed Point to Point
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June 14, 1993

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List A B C D E

TIA agrees with the following points of the Alcatel Compromise Plan submitted with their supplemental comments on ET Docket No. 92-9:

- Retain the 3.75, 2.5, and 1.25 MHz channel bandwidths proposed in the Joint Commenter Plan;
- Retain the 800 and 400 KHz channel bandwidths proposed in the Alcatel Modified Plan;
- Adopt the spectrum efficiency requirements from the Joint Commenter Plan for narrow band systems (5 MHz or less) and adopt the spectral efficiency requirements for wide band systems (10MHz and greater) from the Alcatel Modified Plan *with the exception of 30 MHz channels at 6 GHz being 3 DS3s*;
- Relocate 3.75 MHz channels so that they will not block multiple 5 and 10 MHz channels;
- Removes 40 MHz wide band channels (originally proposed by the Joint Commenters), retains 10 and 20 MHz channels and removes narrow band channels in the 4 GHz band;
- Remove temporary 15 MHz channels from the 6 GHz common carrier band (originally proposed by the Joint Commenters), *however, that during the transition period of 3.5 years to the new spectrum efficiency requirements, the 1/N rule (§21.122, ¶3) remains applicable and thus allows for the subdivision of the 30 MHz channels into 15 MHz channels for 1 DS3 capacity*;
- Adopt the upper 6 GHz and 11 GHz band channelization from the Alcatel Plan; *however, that during the transition period of 3.5 years to the new spectrum*

TIA recommends the following modifications to the Alcatel Compromise Plan:

- Alcatel Compromise Plan: Give microwave users the option to concatenate multiple contiguous channels,

TIA Modification: Concatenation should only be allowed when no other channels are available and only on center frequencies already in the band.

- Alcatel Compromise Plan: Adopt the spectrum efficiency requirements for wide band systems (10 MHz or greater) from the Alcatel Modified Plan.

TIA Modification: The spectrum efficiency requirement for 30 MHz channels at 6 GHz becomes 3 DS3s (it remains at 2 DS3s for 11 GHz);

- Alcatel Compromise Plan: Phasing in the spectrum efficiency requirements after a 2 year transition period.